

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

JOHN KINLAW,)
Plaintiff,) Civil Action No.:
v.) 3:17-cv-00772-REP
DR. CHARLES NWAOKOCHA, et al.,)
Defendants.)

**PLAINTIFF'S PROPOSED JURY INSTRUCTIONS
AND PROPOSED VERDICT FORM**

Pursuant to the Court's Rule 16(B) Scheduling Order and Local Rule 51, Plaintiff John Kinlaw hereby offers the following proposed jury instructions (Exhibit A) and proposed verdict form (Exhibit B).

Respectfully submitted, this 5th day of July 2019.

/s/ MARIO B. WILLIAMS
Mario B. Williams (VSB #91955)

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CERTIFICATE OF SERVICE

I hereby certify that I have served a true and correct copy of the foregoing PLAINTIFF'S PROPOSED JURY INSTRUCTIONS AND PROPOSED VERDICT FORM with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all counsel of record.

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Respectfully submitted, this 5th day of July 2019.

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